

UNITED STATES DISTRICT COURT
 for the
 District of Oregon

In the Matter of the Search of
 (Briefly describe the property to be searched
 or identify the person by name and address) }
 Randy English }
 Buccal Swabs (DNA Sample) }
 } Case No.3:22-mc-457

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Randy English, DOB: 03/02/1987, FBI number 848719JC5. Buccal Swabs (DNA Sample). English is currently located at Multnomah County Detention Center, 1120 SW 3rd Ave, Portland, OR 97204.

located in the _____ District of _____ Oregon, there is now concealed (identify the person or describe the property to be seized):

DNA of Randy English, DOB: 03/02/1987, FBI number 848719JC5

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

evidence of a crime;
 contraband, fruits of crime, or other items illegally possessed;
 property designed for use, intended for use, or used in committing a crime;
 a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in Possession of a Firearm

The application is based on these facts:

See affidavit which is attached hereto and incorporated herein by this reference.

Continued on the attached sheet.
 Delayed notice of 30 days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

 Jaron T. Cookson, Special Agent, FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
 Telephone at 3:35p.m. (specify reliable electronic means).

Stacie F. Beckerman

Date: 5/6/2022

Judge's signature

City and state: Portland, Oregon

Honorable Stacie F. Beckerman, U.S. Magistrate Judge

Printed name and title

DISTRICT OF OREGON, ss: AFFIDAVIT OF JARON T. COOKSON

Affidavit in Support of an Application
Under Rule 41 for a Search Warrant

I, Jaron T. Cookson, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been so employed since March of 2020. I am currently assigned to the FBI's Portland Division and am part of the Transnational Organized Crime and Violent Gang Squad. In December 2020, I successfully completed the twenty (20) week New Agent's Training course at the FBI Academy in Quantico, Virginia. During that time, I was taught the use and practical application of various investigative techniques employed by federal law enforcement officers. These techniques included, but were not limited to, physical surveillance, use of confidential human sources, analysis of social media and other records, and writing search and arrest warrants. As a federal agent, I am authorized to investigate and enforce violations of the criminal laws set forth in Titles 18 and 21 of the United States Code. Through my training and experience, I have become familiar with the manner in which members of a criminal enterprise communicate and use electronic communications to store, transmit, and distribute information to one another and how they plan, organize, and carry out criminal activity.

2. I submit this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a search warrant to collect DNA from Randy English (hereinafter "ENGLISH"). As set forth below, I have probable cause to believe that ENGLISH's DNA will assist in determining his role in the offense being investigated.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

Applicable Law

4. Title 18, United States Code, Section 922(g)(1) prohibits the possession of a firearm and ammunition by a person who “has been convicted any court of a crime punishable by imprisonment for a term exceeding one year.”

STATEMENT OF PROBABLE CAUSE

Investigation Background

5. The FBI, Portland Police Bureau (PPB), Multnomah County Sheriff’s Office (MCSO), Gresham Police Department (GPD), Homeland Security Investigations (HSI) and other law enforcement agencies are currently investigating the Rollin’ 60’s Neighborhood Crips, or “Rollin’ 60’s,” a confederation street gang which constitutes a criminal enterprise for racketeering conspiracy (Racketeer Influenced and Corrupt Organizations, “RICO”) in violation of 18 U.S.C. §§ 1962 and 1963. Specifically, the Rollin’ 60’s is engaged in a pattern of racketeering activity consisting of violations of state law including murder, attempt murder, conspiracy to commit murder, robbery, and delivery of controlled substances.

6. During the investigation, Randy English (hereinafter “ENGLISH”) was identified as

a member of the Rollin' 60's. This conclusion was based in part on ENGLISH's own admissions documented in a Multnomah County Sheriff's Office (MCSO) Classification Summary Report on November 16, 2021. It was also based on the historic knowledge of multiple investigators familiar with ENGLISH, to include Portland Police Bureau (PPB) officers, as well as my personal observations of social media posts, particularly those made by the Snapchat account username "da_cudanigga,"¹ in which ENGLISH advertised his affiliation with the Rollin' 60s.

7. As detailed in previously signed search warrant affidavits (see their Case Numbers below), investigators used multiple investigative techniques—to include toll analysis, a Pen Register and Trap and Trace Device, and surveillance (physical and video)—to determine ENGLISH was the primary operator of the cell phone assigned phone number 503-501-1460 (hereinafter "**ENGLISH Cell Phone**"). Based on geolocation data received from **ENGLISH Cell Phone**,² combined with physical and video surveillance, investigators also concluded ENGLISH resided at 1818 SW 4th Ave, Apt. 803, Portland, Oregon (hereinafter "**ENGLISH Location**"), and was the primary and only observed operator of a 2003 Mercedes S430 sedan with no front or rear license plate (hereinafter "**ENGLISH Mercedes**"). In November 2021, PPB officers observed ENGLISH distribute controlled substances and subsequently drive **ENGLISH Mercedes**. PPB officers arrested him shortly after these observations and searched **ENGLISH Mercedes**. Officers located individual baggies of blue pills that they suspected to be Fentanyl, and a small individual bag of white substance that they suspected to be crack cocaine. In February 2022, investigators observed ENGLISH engage in multiple "hand-to-hand" drug transactions while using and from inside

¹ On January 27, 2022, United States Magistrate Judge Andrew Hallman signed a warrant authorizing the search of this Snapchat account (3:22-mc-97). As of May 5, 2022, the results provided by Snapchat were under review.

² On February 4 and March 29, 2022, United States Magistrate Judge Jolie A. Russo, signed warrants authorizing the collection of geolocation information from ENGLISH Cell Phone (22-mc-00130 and 22-mc-300).

ENGLISH Mercedes. In May 2022, investigators observed what appeared to be multiple hand-to-hand transactions, either from inside or near **ENGLISH Mercedes**. ENGLISH's arrival and departure from the area where investigators conducted surveillance in February and May 2022, corresponded with geolocation data received from **ENGLISH Cell Phone**.

8. Investigators began receiving geolocation data from **ENGLISH Cell Phone** on February 4, 2022. On February 8, 2022, Investigators located **ENGLISH Mercedes** parked in front of an apartment complex located in the same vicinity as the geolocation data provided by **English Cell Phone**. Investigators conducted electronic surveillance at that apartment complex for approximately one week and observed ENGLISH arrive and depart in **ENGLISH Mercedes** on multiple occasions. ENGLISH was the only observed operator of **ENGLISH Mercedes**. Investigators later identified a separate residence frequented by ENGLISH and began conducting electronic surveillance on April 1, 2022. Since that date, investigators observed ENGLISH arrive and depart from the additional residence in **ENGLISH Mercedes**, and only observed ENGLISH operate the vehicle. In addition, investigators conducted physical surveillance in the vicinity of **ENGLISH Location** on April 20 and April 21, 2022. ENGLISH entered and departed in **ENGLISH Mercedes** on April 20. On April 21, he entered and then exited **ENGLISH Mercedes** without operating it. Based on these observations, and the aforementioned surveillance conducted in November 2021, February 2022, and May 2022, I believe ENGLISH is the primary and only observed operator of **ENGLISH Mercedes**. At no point during surveillance was someone other than ENGLISH observed operating **ENGLISH Mercedes**.

Randy English (ENGLISH) Criminal History

9. ENGLISH, aka "Cuda," is a male, DOB: 03/02/1987. According to a query of a law enforcement database, ENGLISH has 2006 felony convictions in Clark County, Washington for Burglary in the First Degree, Robbery in the First Degree, and Robbery in the Second Degree (Court Case number 061009355), for which he was sentenced to 77 months imprisonment. ENGLISH also has a 2018 felony conviction in Multnomah County, Oregon for Delivery of Cocaine within 1,000 feet of a school (Court Case number 17CR57646) for which he was sentenced to 36 months of probation. Those convictions make it unlawful for ENGLISH to possess a firearm.

May 5, 2022, Search Warrants

10. On May 5, 2022, United States Magistrate Judge Stacie F. Beckerman, District of Oregon, signed warrants (22-mc-452 A-C) authorizing the search of **ENGLISH Location**, **ENGLISH Cell Phone**, and **ENGLISH Mercedes** for evidence, contraband, fruits, and instrumentalities of violations of 18 U.S.C. § 1962(d), Conspiracy to Participate in Racketeering Activity; 18 U.S.C. § 1952(a)(3), Using Any Facility in Interstate Commerce to Promote and/or Facilitate Prostitution; and 21 U.S.C. § 841(a), Possession with Intent to Distribute/Distribution of a Controlled Substance.

11. On the night of May 5, 2022, investigators conducted surveillance in the vicinity of **ENGLISH Location** and observed ENGLISH enter **ENGLISH Mercedes** and drive away. ENGLISH was the sole occupant of **ENGLISH Mercedes**.

12. Shortly after ENGLISH drove **ENGLISH Mercedes** away, PPB officers conducted a traffic stop of **ENGLISH Mercedes**. Officers told ENGLISH he was being

"detained" and gave him instructions as the sole occupant to exit the vehicle. ENGLISH was placed in handcuffs and was detained without incident. Officers conducted a pat-down of his person, which yielded no weapons or controlled substances.

13. I read ENGLISH the search warrants and explained the purpose of his detention and our search. Investigators then searched **ENGLISH Mercedes**. Investigators used the car key to unlock the glove compartment of **ENGLISH Mercedes**, which was readily accessible to ENGLISH as the driver. Inside the glove compartment, investigators located a black Springfield XD-45 Sub-Compact, a .45 caliber semi-automatic handgun, serial number GM510161. The firearm had a loaded magazine inserted and a round in the chamber. The words "SPRINGFIELD ARMORY U.S.A.," "SPRINGFIELD INC. GENESEO, IL," and "MADE IN CROATIA" were stamped on the firearm. PPB obtained a DNA sample from the firearm. PPB then inspected the firearm, which appeared to be operable and readily capable of firing. PPB transported the firearm to test-fire it the next day. I know that if the weapon was manufactured in Geneseo, IL and/or Croatia it, therefore, travelled in interstate and foreign commerce.

14. Investigators also located a bag with multiple bindles containing white powdery substance, positioned next to the firearm inside of the glove department box. Investigators then completed a search of **ENGLISH Location**, during which a zip-sealed bag of white powdery substance was seized.

15. Based on my training and experience, and in consultation with others in law enforcement, I am aware that DNA collected from ENGLISH can be analyzed and compared to DNA samples collected from items of evidence, including the Springfield XD-45 seized from the glove compartment of **ENGLISH Mercedes**. As stated above, I know PPB collected a DNA

sample from the firearm during the aforementioned search. I am also aware that DNA is a unique identifier that will assist in establishing the role of ENGLISH in the offense under investigation. After receipt of the DNA sample that is sought by this search warrant, the Oregon State Police Forensics Laboratory will compare the DNA sample to the DNA recovered from examined evidence

Conclusion

16. Based on the foregoing, I have probable cause to believe, and I do believe, that ENGLISH committed the crime of Felon in Possession of a Firearm, in violation of 18 U.S.C. § 922(g)(1). Furthermore, I have probable cause to believe, and I do believe that ENGLISH's DNA, which may be obtained by swabbing the interior cheek in his/her mouth, is evidence of the crime. I therefore request that the Court issue the proposed search warrant pursuant to Federal Rule of Criminal Procedure 41. I further request that the FBI and its designated agents be permitted to collect a DNA sample from ENGLISH pursuant to the warrant.

17. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Thomas H. Edmonds, and AUSA Edmonds advised me that in his opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

Request for Sealing

18. I further request that this Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested search warrant, including the application, this affidavit, and the requested search warrant. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any

disclosure of the information at this time may seriously jeopardize this ongoing investigation.

Premature disclosure of the contents of this the application, this affidavit, the attachments, and the requested search warrant may adversely affect the integrity of the investigation.

By phone

Jaron T. Cookson
Special Agent, FBI

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 3:35 p.m. on May 6, 2022.



THE HONORABLE STACIE F. BECKERMAN
United States Magistrate Judge